

**From:** Jameel Jaffer  
**To:** Todd Dickerson  
**Cc:** Ramya Krishnan; psteffensen@smu.edu; Thomas Ray  
**Subject:** Re: Coalition for Indep. Tech. Rsch. v. Greg Abbott, et al.  
**Date:** Thursday, October 12, 2023 4:59:27 PM

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Todd, I think I've already given you my response. I'd be grateful if you'd include it in your filing with the court. Thanks.

Jameel

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**From:** Todd Dickerson <Todd.Dickerson@oag.texas.gov>  
**Date:** Thursday, October 12, 2023 at 4:43 PM  
**To:** Jameel Jaffer <Jameel.Jaffer@knightcolumbia.org>  
**Cc:** Ramya Krishnan <ramya.krishnan@knightcolumbia.org>, psteffensen@smu.edu <psteffensen@smu.edu>, Thomas Ray <Thomas.Ray@oag.texas.gov>  
**Subject:** Re: Coalition for Indep. Tech. Rsch. v. Greg Abbott, et al.

Jameel:

Some of the reasons why we are seeking additional pages are: (1) you got the First Amendment standard wrong, and we have to explain why; (2) plaintiff does not have standing for a vast majority of its claims, and we have to explain why; and (3) we need to respond to the numerous declarations you filed. Are you willing to concede these points and withdraw your declarations? If so, we would certainly be able to keep our opposition shorter. Please let me know by 3:00 pm tomorrow.

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**From:** Jameel Jaffer <Jameel.Jaffer@knightcolumbia.org>  
**Sent:** Thursday, October 12, 2023 2:56 PM  
**To:** Todd Dickerson <Todd.Dickerson@oag.texas.gov>  
**Cc:** Ramya Krishnan <ramya.krishnan@knightcolumbia.org>; psteffensen@smu.edu <psteffensen@smu.edu>; Thomas Ray <Thomas.Ray@oag.texas.gov>  
**Subject:** Re: Coalition for Indep. Tech. Rsch. v. Greg Abbott, et al.

Todd, we oppose your motion. Because we're briefing the motion to dismiss and the preliminary injunction motion simultaneously, we'll collectively be filing 100 pages of briefing before the Nov 15 hearing if we adhere to the court's usual page limitations. (That number doesn't include the declarations, which may add several hundred pages more.) That seems like more than enough to us, especially since the questions at issue in the two motions are overlapping.

Jameel

On Oct 12, 2023, at 2:09 PM, Todd Dickerson <Todd.Dickerson@oag.texas.gov> wrote:

Jameel:

We are planning to file a motion to extend the page limits for our opposition to Plaintiff's motion for a preliminary injunction, seeking leave to file a 37-page (or less) opposition. The general need for an extension is this is necessary to adequately advise the Court about the issues concerning TikTok and to adequately brief the legal issues implicated by Plaintiff's motion.

Please advise, by 3:00 p.m. tomorrow, whether or not you consent to our motion. If you do not consent, please explain the reasons why. Thanks.

Todd Dickerson  
General Litigation Division  
Office of the Attorney General of Texas  
P.O. Box 12548, Capital Station  
Austin, Texas 78711  
tel. (512) 475-4082

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**From:** Jameel Jaffer <Jameel.Jaffer@knightcolumbia.org>  
**Sent:** Saturday, September 23, 2023 1:03 PM  
**To:** Todd Dickerson <Todd.Dickerson@oag.texas.gov>; Ramya Krishnan <ramya.krishnan@knightcolumbia.org>; Thomas Ray <Thomas.Ray@oag.texas.gov>  
**Cc:** psteffensen@smu.edu; Christina Cella <Christina.Cella@oag.texas.gov>  
**Subject:** Re: Coalition for Indep. Tech. Rsch. v. Greg Abbott, et al.

Todd, sorry for the delayed response. We'd be willing to proceed in that way (i.e. on the papers), if you're willing to do that, too.

Jameel

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**From:** Todd Dickerson <Todd.Dickerson@oag.texas.gov>  
**Date:** Thursday, September 21, 2023 at 10:59 AM  
**To:** Jameel Jaffer <Jameel.Jaffer@knightcolumbia.org>, Ramya Krishnan

<ramya.krishnan@knightcolumbia.org>, Thomas Ray

<Thomas.Ray@oag.texas.gov>

**Cc:** psteffensen@smu.edu <psteffensen@smu.edu>, Christina Cella

<Christina.Cella@oag.texas.gov>

**Subject:** RE: Coalition for Indep. Tech. Rsch. v. Greg Abbott, et al.

Jameel:

If memory serves, I believe you mentioned wanting to do the preliminary injunction hearing on the papers, meaning you are not intending to bring witnesses to the hearing scheduled for November 15, 2023. Is that still the case?

Todd Dickerson  
General Litigation Division  
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**From:** Jameel Jaffer <Jameel.Jaffer@knightcolumbia.org>

**Sent:** Saturday, September 9, 2023 4:39 PM

**To:** Todd Dickerson <Todd.Dickerson@oag.texas.gov>; Ramya Krishnan <ramya.krishnan@knightcolumbia.org>; Thomas Ray <Thomas.Ray@oag.texas.gov>

**Cc:** psteffensen@smu.edu; Christina Cella <Christina.Cella@oag.texas.gov>

**Subject:** Re: Coalition for Indep. Tech. Rsch. v. Greg Abbott, et al.

Todd, it seems highly unlikely to us that the court will grant your request (or even your alternative request) given that our PI motion is predicated on allegations of ongoing and irreparable injuries. Of course you're entitled to file your motion; if you do, we'll oppose it. As we said on Wednesday, though, we'd be open to negotiating a briefing schedule that would give you (and us) a little more time. What we'd propose is that we file simultaneous briefs:

- Oct 6 (4 weeks from now) – your opposition to our PI motion, our opposition to your MTD

- Oct 20 (2 weeks from then) – your reply in support of the MTD, our reply in support of the PI motion

We know that you'd prefer to have even more time, but, in light of the ongoing implications of the ban for our clients, we can't agree to more time than proposed above. And we don't think you are likely to get more than this from the court. (We of course reserve the right to ask the court to impose tighter deadlines than those proposed above, if we are unable to reach a negotiated agreement.)

If we can agree to a briefing schedule, perhaps we can also agree to limit the length of the opposition and reply briefs, given the overlap in issues between the MTD and the PI motion. I'm sure the court would appreciate that.

Thanks.

Jameel

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**From:** Todd Dickerson <[Todd.Dickerson@oag.texas.gov](mailto:Todd.Dickerson@oag.texas.gov)>  
**Date:** Saturday, September 9, 2023 at 8:58 AM  
**To:** Jameel Jaffer <[Jameel.Jaffer@knightcolumbia.org](mailto:Jameel.Jaffer@knightcolumbia.org)>, Ramya Krishnan <[ramya.krishnan@knightcolumbia.org](mailto:ramya.krishnan@knightcolumbia.org)>, Thomas Ray <[Thomas.Ray@oag.texas.gov](mailto:Thomas.Ray@oag.texas.gov)>  
**Cc:** [psteffensen@smu.edu](mailto:psteffensen@smu.edu) <[psteffensen@smu.edu](mailto:psteffensen@smu.edu)>, Christina Cella <[Christina.Cella@oag.texas.gov](mailto:Christina.Cella@oag.texas.gov)>  
**Subject:** RE: Coalition for Indep. Tech. Rsch. v. Greg Abbott, et al.

Jameel:

I just wanted to let you know that Defendants will likely be filing a motion to stay this case pending the resolution of Defendants' motion to dismiss. In the alternative, Defendants will be seeking an extension of a few months to their deadline to file a response to Coalition's motion for a preliminary injunction. Please advise, by 10:00 a.m. on September 11, 2023, whether you are opposed to this request and, if so, the reasons for your opposition. If you do not respond by then, I will mark you down as opposed, given the nature of our prior conversation on this matter. Feel free to call if you want to discuss. I am around this weekend.

Todd Dickerson  
General Litigation Division  
Office of the Attorney General of Texas  
P.O. Box 12548, Capital Station  
Austin, Texas 78711  
tel. (512) 475-4082

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**From:** Jameel Jaffer <[Jameel.Jaffer@knightcolumbia.org](mailto:Jameel.Jaffer@knightcolumbia.org)>

**Sent:** Wednesday, September 6, 2023 2:56 PM

**To:** Todd Dickerson <[Todd.Dickerson@oag.texas.gov](mailto:Todd.Dickerson@oag.texas.gov)>; Ramya Krishnan <[ramya.krishnan@knightcolumbia.org](mailto:ramya.krishnan@knightcolumbia.org)>; Thomas Ray <[Thomas.Ray@oag.texas.gov](mailto:Thomas.Ray@oag.texas.gov)>; Mason Currah <[Mason.Currah@oag.texas.gov](mailto:Mason.Currah@oag.texas.gov)>

**Cc:** [psteffensen@smu.edu](mailto:psteffensen@smu.edu)

**Subject:** Re: Coalition for Indep. Tech. Rsch. v. Greg Abbott, et al.

Hi Todd,

We intend to file a motion for a preliminary injunction in this case tomorrow. We'll be asking the court for a declaration that Texas's TikTok ban is unconstitutional as applied to public university faculty, and an injunction requiring the Defendants to exempt the Plaintiff's members from the ban "unless and until Defendants provide them with a constitutionally adequate means of accessing TikTok for research and teaching purposes." We would like to inform the Court whether Defendants will oppose our motion, and, if they will oppose it, why they will do so. See Rule CV-7(g) (requiring "counsel for the parties [to] confer[] in a good-faith attempt to resolve the matter by agreement and [to] certif[y] the specific reason that no agreement could be made.").

We would very much appreciate your response this afternoon. If you would prefer to speak by phone about this, we can make ourselves available at your convenience. If we speak by phone, perhaps we can also discuss the briefing schedule. I'm at 646-745-8503.

Thanks for your attention to this.

Jameel

Jameel Jaffer  
Executive Director  
Knight First Amendment Institute

Columbia University

[www.knightcolumbia.org](http://www.knightcolumbia.org)

---

**From:** Todd Dickerson <[Todd.Dickerson@oag.texas.gov](mailto:Todd.Dickerson@oag.texas.gov)>

**Date:** Wednesday, August 23, 2023 at 3:13 PM

**To:** Ramya Krishnan <[ramya.krishnan@knightcolumbia.org](mailto:ramya.krishnan@knightcolumbia.org)>, Thomas Ray <[Thomas.Ray@oag.texas.gov](mailto:Thomas.Ray@oag.texas.gov)>, Mason Currah <[Mason.Currah@oag.texas.gov](mailto:Mason.Currah@oag.texas.gov)>

**Cc:** Jameel Jaffer <[Jameel.Jaffer@knightcolumbia.org](mailto:Jameel.Jaffer@knightcolumbia.org)>, [psteffensen@smu.edu](mailto:psteffensen@smu.edu) <[psteffensen@smu.edu](mailto:psteffensen@smu.edu)>

**Subject:** RE: Coalition for Indep. Tech. Rsch. v. Greg Abbott, et al.

Understood, and thanks for the courtesy.

Todd Dickerson  
General Litigation Division  
Office of the Attorney General of Texas  
P.O. Box 12548, Capital Station  
Austin, Texas 78711  
tel. (512) 475-4082

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**From:** Ramya Krishnan <[ramya.krishnan@knightcolumbia.org](mailto:ramya.krishnan@knightcolumbia.org)>

**Sent:** Wednesday, August 23, 2023 2:09 PM

**To:** Todd Dickerson <[Todd.Dickerson@oag.texas.gov](mailto:Todd.Dickerson@oag.texas.gov)>; Thomas Ray <[Thomas.Ray@oag.texas.gov](mailto:Thomas.Ray@oag.texas.gov)>; Mason Currah <[Mason.Currah@oag.texas.gov](mailto:Mason.Currah@oag.texas.gov)>

**Cc:** Jameel Jaffer <[Jameel.Jaffer@knightcolumbia.org](mailto:Jameel.Jaffer@knightcolumbia.org)>; [psteffensen@smu.edu](mailto:psteffensen@smu.edu)

**Subject:** Re: Coalition for Indep. Tech. Rsch. v. Greg Abbott, et al.

Hi Todd,

We agree to an additional ten-day extension. That said, we are still considering the possibility of seeking preliminary relief. If we decide to file a preliminary injunction motion before your response is due, we will reach out about negotiating a briefing schedule.

EXHIBIT A

Best,  
Ramya

---

**From:** Todd Dickerson <[Todd.Dickerson@oag.texas.gov](mailto:Todd.Dickerson@oag.texas.gov)>

**Date:** Wednesday, August 23, 2023 at 2:24 PM

**To:** Ramya Krishnan <[ramya.krishnan@knightcolumbia.org](mailto:ramya.krishnan@knightcolumbia.org)>, Thomas Ray  
<[Thomas.Ray@oag.texas.gov](mailto:Thomas.Ray@oag.texas.gov)>, Mason Currah <[Mason.Currah@oag.texas.gov](mailto:Mason.Currah@oag.texas.gov)>

**Cc:** Jameel Jaffer <[Jameel.Jaffer@knightcolumbia.org](mailto:Jameel.Jaffer@knightcolumbia.org)>, [psteffensen@smu.edu](mailto:psteffensen@smu.edu)  
<[psteffensen@smu.edu](mailto:psteffensen@smu.edu)>

**Subject:** RE: Coalition for Indep. Tech. Rsch. v. Greg Abbott, et al.

Ramya:

Would you be willing to give Defendants an extra 10 days, until September 18th, to file an answer/response to the complaint? Sorry for asking for another extension. I have had to deal with numerous unexpected discovery issues following my return from vacation. I also had to file a 5th Circuit brief, and I have another significant district court filing due right around the same time as this case. This has made it hard for me to give your case the time and attention it deserves. I will, of course, grant you the same courtesies should you need it.

Todd Dickerson  
General Litigation Division  
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P.O. Box 12548, Capital Station  
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**From:** Ramya Krishnan <[ramya.krishnan@knightcolumbia.org](mailto:ramya.krishnan@knightcolumbia.org)>

**Sent:** Friday, August 4, 2023 1:29 PM

**To:** Thomas Ray <[Thomas.Ray@oag.texas.gov](mailto:Thomas.Ray@oag.texas.gov)>; Todd Dickerson  
<[Todd.Dickerson@oag.texas.gov](mailto:Todd.Dickerson@oag.texas.gov)>; Mason Currah <[Mason.Currah@oag.texas.gov](mailto:Mason.Currah@oag.texas.gov)>

**Cc:** Jameel Jaffer <Jameel.Jaffer@knightcolumbia.org>; psteffensen@smu.edu

**Subject:** Re: Coalition for Indep. Tech. Rsch. v. Greg Abbott, et al.

Mr. Ray,

We remain unopposed to the extension the defendants seek. The draft motion (including certificate of conference) and proposed order look fine to us.

Best,  
Ramya

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**From:** Thomas Ray <[Thomas.Ray@oag.texas.gov](mailto:Thomas.Ray@oag.texas.gov)>

**Date:** Friday, August 4, 2023 at 1:13 PM

**To:** Ramya Krishnan <[ramya.krishnan@knightcolumbia.org](mailto:ramya.krishnan@knightcolumbia.org)>, Todd Dickerson <[Todd.Dickerson@oag.texas.gov](mailto:Todd.Dickerson@oag.texas.gov)>, Mason Currah <[Mason.Currah@oag.texas.gov](mailto:Mason.Currah@oag.texas.gov)>

**Cc:** Jameel Jaffer <[Jameel.Jaffer@knightcolumbia.org](mailto:Jameel.Jaffer@knightcolumbia.org)>, psteffensen@smu.edu <[psteffensen@smu.edu](mailto:psteffensen@smu.edu)>

**Subject:** RE: Coalition for Indep. Tech. Rsch. v. Greg Abbott, et al.

Hello Ms. Krishnan,

Thank you very much for your response. Since the last email, we have received summons for all the defendants.

With that in mind, we have prepared a draft motion to extend the answer/response deadline for all defendants to September 8.

I'm attaching the draft motion and proposed order.

Please review and let me know if you are still unopposed to the extension, and if the certificate of conference accurately summarizes your position.

We would like to file the motion by Monday (August 7) or Tuesday (August 8) at the latest to allow the Court ample time to consider the motion.

Thank you again for your time.

Sincerely,  
Tommy Ray  
Legal Assistant  
General Litigation Division  
Office of the Attorney General of Texas

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**From:** Ramya Krishnan <[ramya.krishnan@knightcolumbia.org](mailto:ramya.krishnan@knightcolumbia.org)>

**Sent:** Tuesday, August 1, 2023 8:57 AM



**To:** Thomas Ray <[Thomas.Ray@oag.texas.gov](mailto:Thomas.Ray@oag.texas.gov)>; Todd Dickerson <[Todd.Dickerson@oag.texas.gov](mailto:Todd.Dickerson@oag.texas.gov)>; Mason Currah <[Mason.Currah@oag.texas.gov](mailto:Mason.Currah@oag.texas.gov)>  
**Cc:** Jameel Jaffer <[Jameel.Jaffer@knightcolumbia.org](mailto:Jameel.Jaffer@knightcolumbia.org)>; [psteffensen@smu.edu](mailto:psteffensen@smu.edu)  
**Subject:** Coalition for Indep. Tech. Rsch. v. Greg Abbott, et al.

Dear Mr. Ray,

I represent the plaintiff in this matter, along with Mr. Jaffer and Mr. Steffensen. Thank you for contacting us.

We are willing to agree to the extension you propose. In the spirit of transparency, we should let you know that we are considering the possibility of asking the court for preliminary relief. If we do file a preliminary injunction motion before your response is due, we would be willing to negotiate a briefing schedule that gave you three weeks to oppose the motion and gave us two weeks to reply, and to consent to a stay of your response deadline until after the motion is resolved.

Best,  
Ramya

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Ramya Krishnan  
Pronouns: she, her  
Senior Staff Attorney  
Knight First Amendment Institute at Columbia University  
475 Riverside Dr. | New York, NY 10115  
[ramya.krishnan@knightcolumbia.org](mailto:ramya.krishnan@knightcolumbia.org) | [\(646\) 745-8506](tel:6467458506)

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**From:** Thomas Ray <[Thomas.Ray@oag.texas.gov](mailto:Thomas.Ray@oag.texas.gov)>  
**Date:** Monday, July 31, 2023 at 12:19 PM  
**To:** [psteffensen@smu.edu](mailto:psteffensen@smu.edu) <[psteffensen@smu.edu](mailto:psteffensen@smu.edu)>, Jameel Jaffer <[Jameel.Jaffer@knightcolumbia.org](mailto:Jameel.Jaffer@knightcolumbia.org)>  
**Cc:** Todd Dickerson <[Todd.Dickerson@oag.texas.gov](mailto:Todd.Dickerson@oag.texas.gov)>, Mason Currah <[Mason.Currah@oag.texas.gov](mailto:Mason.Currah@oag.texas.gov)>, Thomas Ray <[Thomas.Ray@oag.texas.gov](mailto:Thomas.Ray@oag.texas.gov)>  
**Subject:** Coalition for Indep. Tech. Rsch. v. Greg Abbott, et al.

Dear Counsel,

I'm writing on behalf of Assistant Attorney Todd Dickerson. Mr. Dickerson will represent the defendants in this matter. He is currently on vacation and will return to the office on August 10.

UNT System was served with summons on Friday, making the current Answer/Response date August 18.

Because of the timing of service and Mr. Dickerson's vacation, he asks for a 21-day extension for filing UNT's Answer/Response.

EXHIBIT A

Please let me know if you have any questions.

Thank you.

Sincerely,

Tommy Ray  
Legal Assistant  
General Litigation Division  
Office of the Attorney General of Texas  
512-475-4145

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